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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re
META MATERIALS INC.,
Debtor.

Case No.: 24-50792-hlb
(Chapter 7)

EX PARTE APPLICATION FOR
AUTHORITY TO INCUR EXPENSE FOR
PRESERVING ELECTRONIC STORED
DATA

Hearing Date: N/A
Hearing Time:

Christina Lovato, chapter 7 trustee (“Trustee Lovato”), for the estate of Meta Materials, Inc. (“Estate” or “Debtor”), files her Ex Parte Application For Authority To Incur Expense For Preserving Electronic Stored Data (“Application”). This Application is supported by the separately filed Declaration of Trustee Lovato.

1. This case was filed on August 9, 2024 and Trustee Lovato was appointed to administer the Estate. [ECF No. 14]. The Schedules of Assets and Liabilities filed by the Debtor indicate that it owns 100% of the equity in nine subsidiaries, several of which are entities operating in Nova Scotia, Canada.

2. The Debtor was a publicly held entity, trading on the U.S. based National Association of Securities Dealers Automated Quotations (“NASDAQ”). Shortly before the petition was filed, NASDAQ de-listed Meta Materials, Inc.

3. In communications with Meta representatives, Trustee Lovato learned that the corporate books and records, including tax related information, are stored on a cloud-based

1 platform. Trustee Lovato worked with Meta representatives to download the information to a
2 secure site hosted by OneHub under the Trustee's control.

3 4. At the time the petition was filed, there were several actions pending involving
4 Meta Materials, Inc. related to securities issues, including:

5 ■ United States District Court, Eastern District of New York, case no. 1:24-CV-1927:

6 Todd Targgart, individually and on behalf
7 of all others similarly situated, Plaintiff,

8 v.

9 Next Bridge Hydrocarbons, Inc.,
Ken Rice, George Palikaras, et al.

10
11 ■ United States District Court, Southern District of New York, case no. 1:24-CV-004806:
12 Securities And Exchange Commission

13 v.

14 John Brda and George Palikaras

15 5. Under 11 U.S.C. § 704(a)(4), Trustee Lovato has a duty to investigate the financial
16 affairs of the Debtor. In furtherance of that duty, Trustee Lovato has taken steps to preserve and
17 secure access to the Debtor's books and records.

18 6. In the unrelated case of In re Double Jump, Inc., case no. 19-50102, pending before
19 Judge Spraker, Trustee Lovato has engaged Oscar Delatorre and Cyber Discovery, Inc., in Miami,
20 Florida, for similar services.

21 WHEREFORE, Trustee Lovato requests authority to incur expenses not to exceed \$7,500
22 for matters related to engaging the services of Cyber Security, Inc. and taking control of, and
23 preserving, the Debtor's books and records.

24 DATED: August 27, 2024.

25 HARTMAN & HARTMAN

26
27 /s/ Jeffrey L. Hartman

28 Jeffrey L. Hartman, Esq.,
Attorney for Trustee